

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:25-CV-21291-LEIBOWITZ/AUGUSTIN-BIRCH

SHELBY MAYES,

Plaintiff,

vs.

J & J GREEN PAPER, INC. AND  
MICHAEL SCOTT SEGAL,

Defendants.

**PLAINTIFF'S STATEMENT OF CLAIM**

Plaintiff, Shelby Mayes, pursuant to the Court's Orders entered on March 21 and April 22, 2025 [ECF Nos. 5 and 10], files this Statement of Claim based on the information known to Plaintiff and estimates as follows:

***Preliminary Statement***

This Statement of Claim is not to be construed as a demand, nor as an exact quantification of her damages, but merely as a case management tool required by the Court. *See Calderon v. Baker Concrete Const., Inc.*, 771 F.3d 807, 811 (11<sup>th</sup> Cir. 2014) ("That document is an extra-Rules practice used by the district court for its convenience and to aid in case management. It does not have the status of a pleading and it is not an amendment under Rule 15 of the Federal Rules of Civil Procedure.")

***Information Requested by the Court***

1. Plaintiff does not have all the time and pay records from his employment at this time, and so she must estimate the hours that worked, the pay that received for those hours, and the corresponding wages due, despite the Court's Order entered on April 22, 2025, requiring the Defendants to produce this information to her [ECF No. 10].

2. Plaintiff prepared this Statement of Claim with the assistance of counsel.

3. Plaintiff estimates that she is owed the principal amount of **\$5,000.00**.

4. Plaintiff calculated the amount she estimated she is owed for the unpaid hours worked as follows:

FLSA Minimum Wages: \$7.25/hour x 160 unpaid hours = **\$1,160.00**

FMWA Minimum Wages: \$13.00/hour x 160 unpaid hours = **\$2,080.00**

B/K and U/E Wages: \$5,000/month (salary) = **\$5,000.00**

5. Plaintiff is claiming that she is owed for wages worked **between December 15, 2024, and January 15, 2025.**

6. Plaintiff also seeks liquidated damages equal to the minimum wages owed to her plus reasonable attorneys' fees and costs pursuant to the FLSA and FMWA.

7. Plaintiff's Statement of Claim is based upon the information currently known and/or available.

8. Plaintiff reserves the right to amend this Statement of Claim based upon additional information provided by Defendants, through discovery, and/or as additional/different information becomes known.

9. This Statement of Claim does not include any computation for damages other than those sought in the operative/pending Complaint and is subject to revision through the course of discovery and/or the amendment of the Complaint.

Respectfully submitted this 15th day of May 2025.

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